

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA,

v.

KAMAIGA GHOLAR

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4:24-CR-371

**MS. GHOLAR’S MOTION TO ADOPT CO-DEFENDANT BROWN’S
MOTION TO DISMISS (DOC. 1467)**

Comes now Kamaiga Gholar through her appointed counsel, and moves to adopt the reasoning of co-defendant Patrick Brown’s renewed motion to dismiss, doc. 1467, with some additional thoughts, as follows:

1. Ms. Gholar is charged in counts 9 and 14 of the now-superseding indictment with conspiracy to commit wire fraud and wire fraud in connection with a bail bond application for defendant, Nicolas Yoder. The language of the charges against Ms. Gholar is identical to the language of the charges against co-defendant Walker in counts 1 and 6. The defects and omissions to the charges that Mr. Brown points out in his motion to dismiss are the same fatal flaws in the government’s pleading against Ms. Gholar, i.e., the indictment neither alleges the existence of any victim nor any intended harm to money or property. In short, as Ms. Gholar has maintained since day one, the indictment fails to allege a federal crime.

Having now enjoyed a thorough week of evidence and argument, the Court is in a

position to conclude that, as to those defendants who have not pleaded guilty and stipulated to facts that might constitute a federal crime, there was no federal crime.

For these reasons, Ms. Gholar moves the Court to allow her to adopt Mr. Brown's motion to dismiss (doc. 1467), and upon consideration since there was a trial, render a verdict of not guilty.

Respectfully submitted,

/S/ Tom Berg

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CERTIFICATE OF SERVICE

I hereby certify that all parties to be served have been served via electronic case filing (ECF) this 15th day of October 2025.

/S/Tom Berg

Tom Berg